

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

TYRITA THOMAS,

*Plaintiff,*

v.

Case No.: 1:24-cv-00156

WASHINGTON GAS LIGHT COMPANY,

and

TEMPORARY SOLUTIONS, INC.

*Defendants.*

**CONSENT MOTION**

Plaintiff Tyrita Thomas (“Plaintiff” or “Ms. Thomas”) filed the Complaint in this action on January 30, 2024. (ECF No. 1.) Defendants Washington Gas Light Company (“Washington Gas”) and Temporary Solutions, Inc. (“Temporary Solutions,” and with Washington Gas referred to as “Defendants”) executed waivers of service dated April 26, 2024, and May 1, 2024, respectively.

On April 23, 2024, Defendants and counsel for Ms. Thomas participated in a mediation before Judge John F. Anderson in a related matter, *Young v. Washington Gas Light Co. & Temporary Solutions, Inc.*, Case No. 1:23-cv-00445. In this regard, Ms. Thomas’ allegations are substantially similar to the allegations presented by Ms. Young in Case No. 1:23-cv-00445, as each case involves substantially the same facts in dispute, witnesses, and issues of law. Accordingly, in connection with the recent mediation of the *Young* case before Judge Anderson, the parties in this case agreed to, and hereby request, that the Court:

1. Stay all deadlines, including, without limitation, for Defendants to file responsive pleadings, to permit Ms. Thomas and Defendants to mediate their dispute, with such

- stay to be in effect until thirty (30) days following the scheduling of any mediation; and
2. Refer this case to Judge Anderson for mediation given his familiarity with the relevant facts, parties, and witnesses from his successful mediation of the *Young* matter.

A proposed order is attached.

Respectfully submitted this 17th day of May, 2024.

/s/ Justin Ferraro

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*Counsel for Defendant Washington Gas Light Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2024, I filed the foregoing Consent Motion using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

Dated: May 17, 2024.

By: /s/ Justin Ferraro

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